



**SRO**

**STATE SCHOOL REFORM/REDESIGN OFFICE**  
Michigan Department of Technology, Management and Budget

# Unreasonable Hardship Determination Report

Law Elementary School

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February 2017

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## **Framework**

### **State School Reform/Redesign Office Background and Legal Authority**

The State School Reform/Redesign Office (SRO) was established in 2010 to serve as Michigan's academic accountability office. The mission of the SRO is to turn Michigan's Priority Schools into the highest-performing schools in Michigan. The SRO's vision is to create the necessary conditions for a globally superior public education system. To do this, the SRO uses both incentives for academic success and consequences for chronic failure. The following state and federal statutes establish the SRO and govern the office's action steps:

Michigan's Revised School Code 380.1280c: Section 1280c of the Revised School Code charges the SRO with the responsibility of identifying and supervising the lowest achieving 5% of schools (Priority Schools). Priority Schools submit reform/redesign plans to improve performance, and the SRO is granted authority to implement intervention if academic progress is not made (i.e. CEO operator for multiple schools, State School Reform/Redesign District (SSRRD), etc.). Priority Schools are required to submit monitoring reports to the SRO in a manner and frequency as determined by the SRO. The statute also provides exemptions for districts under emergency management.

Michigan's Executive Order No. 2015-9: Executive Order 2015-9 transferred the SRO from the Michigan Department of Education (MDE) to the Department of Technology, Management, and Budget (DTMB). It also transferred all authority, powers, duties, functions, and responsibilities assigned to MDE and the Superintendent of Public Instruction under MCL 380.1280c to the SRO.

Michigan Public Act 192 (i.e. Enrolled House Bill 5384): The law divides the Detroit Public School District (DPS) into two separate districts and requires the SRO to mandate school closures via specified stipulations.

Under these statutes, the State School Reform/Redesign Office must make notifications and issue orders to Public School Academy Authorizers and/or Traditional Public School Superintendents/Board Presidents establishing different levels of accountability based on the performance of the schools they operate/authorize.

### **Purpose**

On January 20, 2017, the SRO published the order subjecting [School] to a Next Level of Accountability pending an Unreasonable Hardship Determination as required under subsection 391(3), MCL 380.391(3). The purpose of this report is to:

- Outline the Unreasonable Hardship Review Process
- Detail the findings of the Unreasonable Hardship Review
- Publish the final Unreasonable Hardship Determination for **Law Elementary School**, and
- Detail next steps that the SRO recommends in light of the final Unreasonable Hardship Determination.



## Unreasonable Hardship Review Process

In accordance with MCL 380.391(3), the SRO must complete an analysis of whether closure of **Law Elementary School** will result in unreasonable hardship to pupils attending **Law Elementary School**. The SRO will consider other public school options available to students in the grade levels offered and geographic area served by the public school identified for closure to determine if closing the identified school(s) would result in an unreasonable hardship for the impacted students. The SRO is committed to ensuring that the closure of a failing school does not necessitate the enrollment of a displaced student in another failing school. The SRO's Unreasonable Hardship Review will consist of three parts:

1. **Part 1:** A comprehensive review of all available data related to the past and current performance of the identified school(s)
2. **Part 2:** An academic and an operational on-site review
3. **Part 3:** A detailed examination of other public school options available to students in the grade levels offered and geographic area served by the public school identified for closure.

A set of research-based Turnaround Practices served as the framework for the SRO's Unreasonable Hardship Review. The Turnaround Practices<sup>1</sup> are based on both academic and practice-based research on the common characteristics of successful turnaround schools and are organized into five different domains:

- **Domain 1:** Leadership, Shares Responsibility, and Professional Collaboration
- **Domain 2:** Intentional Practices for Improving Instruction
- **Domain 3:** Providing Student-Specific Supports and Instruction to All Students
- **Domain 4:** School Climate and Culture
- **Domain 5:** District System: Districts develop systems to support, monitor, and sustain turnaround efforts

By structuring the SRO's Unreasonable Hardship Review around these domains the SRO is acknowledging that in determining unreasonable hardship one must not only examine historic performance but must also work intimately with local community members and educators to determine if the academic and operational realities of the identified school reflective of a school poised for rapid turnaround.

All of the information produced and insights gained from the Unreasonable Hardship Review Process have informed the SRO's Final Unreasonable Hardship Determination, which consists of a series of 3 Key Questions:

- **Question 1:** Are the academic and operational realities of the identified school reflective of a school poised for rapid turnaround?
- **Question 2:** Are there are sufficient other public school options reasonably available to these pupils?
- **Question 3:** Would the proposed NLA action result in an unreasonable hardship to the displaced pupils?

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<sup>1</sup> See Edmonds, 1979; Bryk et al., 2010; Marzano, 2003; Newmann et al., 2001; Lane et al., 2014)

## Unreasonable Hardship Review Part 1: Data Review

In an effort to inform the Unreasonable Hardship Determination, the SRO requested a comprehensive set of both academic, cultural, and operational data from **Law Elementary School**. The data provided can be viewed in Appendix A. In reviewing this data as well as previously state-reported academic data, the SRO has identified the following Key Takeaways related to the past, and current realities of **Law Elementary School**.

### Data Review Key Takeaways

- **Academic (Domains 2 and 3)**
  - Proficiency
    - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Mathematics dropped from 7.79% to [REDACTED]
    - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Mathematics dropped from 22.73% to 14.29%
    - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Reading/ELA dropped from 25.23% to 5.92%
    - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Reading/ELA grew from 26.15% to 9.38%
    - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Science dropped from [REDACTED]
    - Between 2014 and 2015 the percent of students with disabilities that demonstrated proficiency in Science was [REDACTED]
    - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Social Studies dropped from [REDACTED]
    - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Social Studies were at [REDACTED]
  - Student Instructional Support Systems (Interventions)
    - Academic Intervention Systems: Foundations, ALEKS Differentiated Reading (K-5), Leveled Literacy Intervention
  - Social/Emotional/Behavioral Intervention Systems: QPR: Suicide Prevention Training
    - Culturally Responsive Teaching Training
    - Life Skills (Botvin): Alcohol Prevention
    - Parent Training, Strengthening Families (Parent Cafe)
    - Positive Behavior Interventions and Supports System (PBIS) PD and implementation
    - Mental Health - School-Based Health or Community Mental Health System
    - Anti-Bullying and Anti-cyberbullying system
    - Youth leadership structures
    - Student support team structure
    - Cross-systems meetings with school support staff and community mental health
    - Mental Health Town Hall for staff, parents and teachers
  - Curriculum
    - ELA: Engage NY
    - Math: Eureka Math/ Engage NY
    - Science: Oakland MAISA Rubricon
    - Social Studies: Oakland MAISA Rubricon

- **Climate and Culture (Domains 3 and 4)**
  - Enrollment
    - Between 2014 and 2016, enrollment grew from 518 to 585 (67 student difference)
    - Between 2014 and 2016 the number of economically disadvantaged students increased from 391 to 521 (130 student difference).
    - Between 2014 and 2016 the percentage of economically disadvantaged students grew from 75.5% to 89.1%.
    - African Americans consistently make up 99% or more of the student population.
    - Between 2014 and 2016 the only decline in student enrollment occurs in grade 5 from 73 to 54 students.
    - All grade levels aside from grade 5 experienced growth in enrollment. Kindergarten experienced the largest increase in student enrollment from 50 to 73 students.
  - Attendance
    - Between 2014 and 2016 the attendance rate has dropped from 90.8% to 84.3%.
    - Between 2014 and 2016 the percentage of chronically absent students has dramatically increased from 17.9% (102 students) to 73.4% (410 students).
- **Professional (Domains 1 and 5)**
  - Teacher Evaluation
    - Between 2014 and 2016 the number of teachers increased by 11 from 19 to 39, almost doubling.
    - The number of teachers rated as highly effective was 0 in 2014 and 0 in 2016.
    - The number of teachers rated as effective increased from 19 (100%) to 23 (59.0%) in 2016.
    - There were 16 teachers rated as marginally effective or ineffective in 2016.
    - In 2016, 14 (35.9%) teachers were rated as marginally effective.
    - In 2016, 2 (5.1%) teachers were rated as ineffective.



## Unreasonable Hardship Review Part 2a: Academic On-Site Review

On February 7, 2017, three representatives of the SRO conducted the Academic On-Site Review for **Law Elementary School**. The purpose of this visit was to gain valuable insight related to the current academic realities of **Law Elementary School** from its building leaders, teachers, parents and community members. The Academic On-Site Review was structured as follows:

- Interviews with Building Leadership
- Building Walk-Through with Classroom Observations
- Teacher Leader Focus Group
- Student Focus Group
- Parent/Community Focus Group

In a letter sent on January 23, 2017, the SRO requested that **Law Elementary School** nominate both teacher leaders as well as parents and community members to participate in the Academic On-Site Review.

The review was structured around the research-based Turnaround Practices and the questions that served to frame both the interviews as well as the focus group discussions were structured around the 5 different domains described above. The responses from each conversation were amalgamated and the responses were evaluated for their alignment with a series of best-practices for high-gain, rapid turnaround schools. The rubric evaluations as well as the SRO's Key-Takeaways are outlined below.

### Rubric Descriptors

<u>Strong alignment with best practice</u>	<u>Moderate alignment with best practice</u>	<u>Low alignment with best practice</u>
All indicators are evident and there is strong evidence that key structures and practices are being used effectively to improve instruction.	Some of the indicators are evident and there is some evidence that key structures and practices are being used effectively to improve instruction.	A few or none of the indicators are evident and/or there is little to no evidence that key structures and practices are being used effectively.

A key purpose of the site visit is to assess each school's capacity to engage in accelerated turnaround and to inform decisions regarding unreasonable hardship. As such, site reviewers and the SRO are focused on the following overarching questions.

<p><b>Domain 1: Leadership, Shares Responsibility, and Professional Collaboration</b></p> <ul style="list-style-type: none"> <li>• Does the school have a collaborative environment (e.g., sufficient teaming structures and ways of working together) that can lead to accelerated instructional improvement?</li> <li>• Does the school leadership have systems in place to monitor and support the implementation of improvement strategies, including the use of frequent classroom observations?</li> </ul>	<p><b>Domain 2: Intentional Practices for Improving Instruction</b></p> <ul style="list-style-type: none"> <li>• Does the school utilize a common core curriculum that is instructionally coherent and that displays a strong understanding of high quality instruction, among teachers and as supported and observed by administrators?</li> <li>• Does school leadership have a system in place to identify teachers that may need additional support, and specific strategies for providing such support?</li> </ul>
<p><b>Domain 3: Providing Student-Specific Supports and Instruction to All Students</b></p> <ul style="list-style-type: none"> <li>• Does the school have and actively utilize a system of assessments and interventions capable of providing student-specific supports and subsequent monitoring of the effectiveness of interventions?</li> </ul>	<p><b>Domain 4: School Climate and Culture</b></p> <ul style="list-style-type: none"> <li>• Does the school provide a safe, orderly, and respectful environment for students and a collegial and professional culture among adults?</li> </ul>

### Determining Capacity for Successful Turnaround

**Key Question 1:** What are the core issues and challenges that have kept students at your school from achieving? How are you addressing these issues and challenges?

**Key Question 2:** What are the key practices and strategies that distinguish your school, and will allow your school to improve, leading to increased student achievement in the near future?

	Alignment with Best Practice
<p><b>Adaptive Instructional Improvement</b> All stakeholders espouse an “improvement mindset” reflected in the school’s continuous review and assessment of improvement practices and strategies used within the school.</p> <p>Key Indicators</p> <ul style="list-style-type: none"> <li>The school stops or modifies strategies that are not working and expands those that are working.</li> </ul>	
<p><b>Respectful and Trusting Learning Environment</b> All stakeholders (students, teachers, community members, etc.) have high expectations for students and value working with and learning from each other.</p> <p>Key Indicators</p> <ul style="list-style-type: none"> <li>Parents and students state that they believe that all of the students in the school will succeed (e.g., will do well in classes, graduate, attend and graduate college).</li> <li>Teachers and administrators work together in formal and informal teams on a regular basis.</li> </ul>	
<p><b>Instructional Rigor</b> Instruction and instructional practices are engaging, differentiated, and sufficiently challenging for all students.</p> <p>Key Indicators</p> <ul style="list-style-type: none"> <li>Teachers provide all students with lessons and instruction directly aligned with common core standards and aligned instructional practices.</li> <li>Written lessons and taught instruction includes stated and written learning objectives, multiple instructional strategies, and challenging (e.g., higher order) tasks, problems, and questioning strategies.</li> </ul>	
<p><b>Targeted Interventions</b> The school expertly uses specific instructional strategies/interventions executed with a high degree of instructional expertise.</p> <p>Key Indicators</p> <ul style="list-style-type: none"> <li>Student work is consistently improving.</li> <li>Instructional strategies and interventions are implemented with fidelity.</li> </ul>	

- Building leadership stated that they are engaged in enrichment and monitoring of staff.
- Teachers are committed to stay at the building because of the leader and the students.
- Leaders have full autonomy in staffing. Teachers also reported Leadership is better now and the kids really like the leaders now.



**Turnaround Strategy Domain 1: Leadership, Shared Responsibility, and Professional Collaboration**

The school has established a community of practice through leadership, shared responsibility, and professional collaboration.

**Key Question:** How, and to what extent, do you (and your leadership team) cultivate shared ownership, responsibility, and professional collaboration in the school?

Turnaround Strategy Components	Alignment with Best Practice
<p><b>Teaming, Shared Leadership and Responsibility, and Collaboration</b></p> <p>Distributed leadership structures and practices are apparent throughout the school building in the form of an active and well-represented Leadership Team and grade-level and vertical teams.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>• The school leadership team meets regularly and includes representation from all grades and student needs.</li> <li>• Grade-level and vertical teams meet regularly.</li> <li>• Teams exhibit a strong commitment to high expectations for all students and a willingness to work together to improve instruction.</li> </ul>	
<p><b>Using Teams, Shared Leadership, and a Collaborative and Trusting Environment to Accelerate Improvement</b></p> <p>Administrators and teachers (through teacher teams or involvement in the leadership team) are monitoring and assessing the implementation and impact of key improvement strategies, use of resources, classroom instructional practices, and non-academic supports on student achievement.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>• <b>Adaptation:</b> Leadership has the demonstrated ability to adapt, innovate and do whatever it takes to improve student achievement.</li> <li>• <b>Instructional Observation:</b> Instruction is formally and informally observed and meaningful feedback is provided. Teachers, as well as students, are held to high expectations.</li> </ul>	

- The Leadership Team appeared cohesive and engaged in positive working relationships. They reported doing regular walkthroughs of instruction and each leader have a cadre of 5-6 teachers under them that they could help mentor and build capacity.
- Building leadership reported a nimbleness with analyzing teacher and student data and making professional development supports and course corrections. This was not evidenced to a high degree during classroom walkthroughs where a lack of rigor or disengaged students was seen repeatedly.
- The Leadership Team reported having a school-wide strategic plan; 95% growth target was shared as being expected by end of spring, but this is not aligned with having students reach proficiency, especially for those that are multiple years behind. To this end, leadership had a teacher growth chart and each teacher had to submit a data action plan; each had their own snapshot; and what they were going to do about it. Leadership had them address (STEP;

individualized PowerPoint on their strategies and provided feedback). Evaluations attached to student growth.

- The Leadership Team also reported that attendance was a large problem. An elementary teacher reported that of 23 students, only 6 or 7 had attendance over 90%.
- The Leadership Team also reported that everything they did stemmed from a collaborative process (with the exception of a few decisions that the principal must make). As a result, they calendar everything out for each week and then make a chart of specific decision making processes and goals.
- The Leadership Team reported that each member of the leadership team has a grade band/grade level leader of teachers and that based on the student schedules PLC were scheduled and maintained.

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**Turnaround Strategy Domain 2: *Intentional Practices for Improving Instruction***

The school uses an aligned system of common core curricula, assessments, and common instructional practices across the school and content areas, and employs intentional practices for improving teacher-specific and student-responsive instruction.

**Key Question:** What are the strategies and practices that you and your colleagues used to improve instruction? How did you work to improve teachers' instruction? What worked, what didn't, and why?

Turnaround Strategy Components	Alignment with Best Practice
<p><b>Common core curriculum and aligned and rigorous instructional practices.</b></p> <p>Administrators and teachers develop and use vertically and horizontally aligned curricula and instructional strategies that includes common units, lessons, assessments, and instructional strategies and language within and across grades and content areas.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>Teachers' unit and lesson plans are similarly structured, incorporating best practices, directly linking lesson content with the grade-level standards and standards taught in prior and subsequent grades.</li> <li>A common set of instructional strategies, academic language, and other learning tools are evident in lessons and in practice, to enable students to access content.</li> </ul>	
<p><b>Defined expectations for high quality instructional practices</b></p> <p>The school has a clear instructional focus and shared expectations for instructional best practices that address students' instructional needs.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>Leaders and teachers understand the instructional focus and how the instructional focus informs (or is evident in) classroom practice.</li> <li>Teachers have received training and professional development on the instruction focus and related instructional strategies.</li> </ul>	
<p><b>Teacher support and feedback to improve instruction</b></p> <p>Teachers are actively supported to develop high quality lessons, deliver high quality lessons and instruction and to become experts in using and refining effective instructional strategies.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>The principal (or administrators or coaches) spend significant time in classrooms, observing teachers' instruction and providing teachers with constructive and useful feedback on instructional practices.</li> <li>Teachers (and teacher team) use a variety of standards-based assessments to assess the effectiveness of instructional strategies and modify instruction accordingly.</li> </ul>	

- The Teacher focus group reported that their school is improving due to the consistency of leadership. According to the teachers, the school will continue to improve over time but there is no evidence to suggest that changes to academic outcomes are forthcoming.
- The Teacher focus group also reported that attendance every day is a challenge.



- Teachers added: And when you call families, the numbers are wrong.
- The Teacher Focus group reported that a lot of kids are local or live in nearby neighborhoods. Many kids are behind in basic skills and counting on fingers in 6<sup>th</sup> and 7<sup>th</sup> grade. This is addressed by having 2 hour blocks of English and 2 hour blocks of Math each day. Twice as much time as normal. Smaller class sizes for these core subjects (like 16 or 17 students). Students are far behind academically.
- According to teachers, they have to spend a lot of time redirecting behavior. At any one time, 60-70% of kids might be disengaged. These students need to be hooked, said teachers.
- Consistency is an issue. Lots of kids have lacked consistency in this building prior to the previous year in terms of staff. But things are consistent now. Consistency in staff and in expectations.
- Teachers reported that observing videos of their classroom instruction was helpful and the work of the leadership team is doing to help them is authentically appreciated.
- Teachers are now focused during staff development opportunities on methods of becoming highly effective, although there did not seem to be a focus on high student expectations or student achievement. The focus seems very adult centered with a plethora of excuses blaming student behavior as the reason for their plight.

**Turnaround Strategy Domain 3: Providing Student-Specific Supports and Instruction to All Students**

The school is able to provide student-specific supports and interventions informed by data and the identification of student-specific needs

**Key Question:** How, and to what extent, does your school provide student-specific supports and interventions to students?

Turnaround Strategy Components	Alignment with Best Practice
<p><b>Tiered and Targeted Interventions for Students and Monitoring for Effectiveness</b></p> <p>The school has a system (structures, practices, resources) for providing targeted instructional interventions and supports to all students which also includes close monitoring of the impact of tiered interventions on students' progress.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>Students are provided with targeted, student-specific instruction and interventions in direct response to their academic areas of need, rather than placing entire groups of students in intervention groups.</li> <li>The impact of classroom-based and tiered interventions is frequently monitored (e.g., regularly, in 2, 4, or 6 week intervals and often by grade-level teams or by school support teams) and then refined in direct response to students' needs.</li> </ul>	
<p><b>Data Use and Data Informed Targeting of Interventions</b></p> <p>Administrators and teachers use a variety of ongoing assessments (formative, benchmark, and summative) to frequently and continually assess instructional effectiveness and to identify students' individual academic needs.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>A variety of valid and reliable assessments (standards-based and performance assessments) are used consistently, within and across grades and content area.</li> <li>Administrators and teachers are using assessment to identify the specific students needing additional support and the targeted areas of need for each specific student.</li> </ul>	

- The Student focus group reported that their work was not challenging enough as instruction seemed to targeted at the lowest performers within their grades.
- The Student focus group also reported that sometimes teachers are short with them, meaning that the students get the feeling that the teachers are unhappy and stressed, and that they take out their frustrations on the students. According to the students, changing this behavior could improve relationships between teachers and students, thereby reducing classroom behavior instances.
- A building walkthrough revealed many examples where students were often, disengaged, and not on task.
- The classroom walkthroughs showed that centers were being used, but not with proficiency or rigor in all classes.



**Turnaround Strategy Domain 4: School Climate and Culture**

The school has established a climate and culture that provides a safe, orderly and respectful environment for students and a collegial, collaborative, and professional culture among teachers that supports the school's focus on increasing student achievement.

**Key Question:** How does your school attend to students' social-emotional health and establish a safe, orderly, and respectful environment for students?

Turnaround Strategy Components	Alignment with Best Practice
<p><b>Safety and secure learning environment.</b> The school has established and provides a safe and secure learning environment for students, staff and community members.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>• Student to student interaction and teacher to student interactions are respectful and considerate, as observed during the visit.</li> </ul>	
<p><b>Shared Behavioral Expectations that support student learning</b> Administrators and teachers have and use a clearly established set of behavioral expectations and practices that supports students' learning.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>• Expectations of student behavior are written and clearly shared and understood throughout the school building.</li> <li>• Behavioral expectations are reinforced through consistently applied rewards and consequences (consistent among and across teachers and grades).</li> </ul>	
<p><b>Targeted and effective social-emotional supports</b> The school has identified, established, and proactively provides effective social-emotional resources and supports for students in need of such supports and assistance.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> <li>• The school has identified a wide array of effective social-emotional responses and supports for students in need of such assistance and support.</li> <li>• Students that may need or benefit from social-emotional supports are identified and receive targeted social-emotional support.</li> <li>• Data on the effectiveness of social-emotional supports is collected and monitored.</li> </ul>	

- The Teacher focus group reported that teachers are asking why they should invest. They do not feel stability. They do not have support from leadership outside of their building.
- The Parents and Community focus group also reported that teachers need to work more with community members.
- On the other hand, each teacher seems to know the students and their parents. One parent said, "I really like this school and travel to bring my daughter here [who has a disability]. I appreciate the time and effort. This is a community school."
- The Parents and Community focus group reported that the climate and culture three years ago was pretty chaotic. It was way worse than other buildings. Then, the current principal began



arrived and began making large changes, and it feels much better as a result. The kids are so much nicer to each other and it is not as chaotic.

- However, community members added that the community itself does not hold education very high. To change that will take work, staff consistency and a concerted effort on the part of the administration and staff to be available.
- Offering awards and incentives to students, has been seen as helpful. These awards are shifting to being more academic in nature, classroom engaged, most improved, etc.
- Parent focus groups reported concerns regarding curriculum and consistency among school leaders.
- The Student focus group shared that teacher disrespect by students was an issue. Teachers here thought that teacher respect had improved so much between last year and this year, but it was still an issue. They suggested that many teachers are working together to get better. It's like last year was being in the mud and this year is digging out.
- The Parent focus group shared that personal respect has shifted in this generation and that this generation of students are generally less respectful. The adage says that when we give respect, we can expect it in turn as a result. This is a growth area for students and not necessarily observed outside the building.

**Turnaround Strategy Domain 5: District System to Support Accelerated Improvement and Turnaround**

The district has developed systems for identifying schools that are not performing well, and strategies for monitoring and supporting school leadership and teachers.

Examples of district systems:

- Strategic placement and assignment of principals and teachers in high need schools, including the use of incentives to get the right leaders and teachers in high need schools.
- Provision of additional staffing and resource autonomy to leaders in high need schools
- Provision of additional supports (e.g., coaching supports, instructional resources) to high need schools.

**Key Questions:**

- How does the district monitor and/or support you in your efforts to improve instruction and raise student achievement?
- To what extent has the district provided you with additional autonomy to make changes to staff (e.g., to hire new teachers and/or quickly remove teachers not supportive of your work), to the school's schedule, and in your use of resources? How much autonomy do you have?

	Alignment with Best Practice
<b>District Capacity - Core Functions</b> The District has established and/or provides schools with base supports necessary for effective teaching and learning (Core curriculum and professional development, assessments, data systems, instructional materials, human capital).	
<b>District capacity - Monitor and support</b> The district has established and communicated a district-wide improvement strategy, including a vision and specific goals for improvement. The improvement strategy includes specific strategies for monitoring and supporting schools (leaders, teachers, and students).	
<b>District Capacity – Conditions and Autonomy</b> The district provides schools with sufficient autonomy and authority to implement turnaround actions, while holding schools accountable for results.	

**All Focus Groups Combined:**

- Teachers expressed that the district had changed curriculum repeatedly and teachers (and parents) were very concerned about it.
- District coaches in lesson planning, etc. are helpful as are leadership team assistance for teachers.

**Unreasonable Hardship Review Part 2b: Operational On-Site Review (Facility Conditions Index)**

The SRO partnered with DTMB's Facilities & Business Services Administration Office (SFA) to determine a facility conditions index (FCI) for **Law Elementary School**. The FCI measures maintenance and repair costs against current replacement cost of the building. The lower the number, the less cost effective it is for the district to keep the building open.

All inspections were designed to be non-intrusive and the results were based on observations and assumptions given the factual knowledge provided.

**FCI SCORE: 67.0**

A copy of DTMB's FCI report is attached to this report as Appendix B.

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### Unreasonable Hardship Review Part 3: Access and Availability

Whether statutorily required under MCL 380.391(3), MCL 380.507(6), MCL 380.528(6), or MCL 380.561(6), or optionally adopted under MCL 380.1280c, the SRO is committed to completing an analysis of whether the proposed closure will result in unreasonable hardship to pupils attending **Law Elementary School**. The SRO will consider other public school options available to students in the grade levels offered and geographic area served by **Law Elementary School** to determine if the closure would result in an unreasonable hardship for the impacted students. The SRO is committed to ensuring that any closure does not necessitate the enrollment of a displaced student in another failing school. When evaluating the sufficiency of other public school options for affected pupils and unreasonable hardship, the SRO evaluates a variety of factors that can generally be organized into three different categories. These categories include, but are not limited to:

- **Geography:** Are there schools within a reasonable number of miles from the school identified that serve the same grade levels as the identified school?
- **Performance:** Are there schools that were identified during the geographic evaluation that also have an acceptable Top-to-Bottom ranking?
- **Access:** Do the students that would be displaced by the NLA Action have reasonable access to the schools identified during both the geographic and performance evaluations?

The results of the SRO's analysis are included in the below table. The number of schools that meet the parameters defined in the left most two columns is included in column #3 and the estimated capacity of the qualifying schools is included in column #4. The right-most two columns define the # of qualifying schools that would not require students to utilize the schools-of-choice legislation (MCL 388.1705/MCL 388.1705c) to gain access and the estimated capacity of those qualifying schools that would not require utilization of the schools-of-choice legislation.

Distance Parameter (Maximum in miles)	TTB Ranking Parameter (Minimum)	# of Qualifying School-of-Choice Schools	Estimated Capacity of Qualifying School-of-Choice Schools	# of Qualifying Local Access Schools	Estimated Capacity of Qualifying Local Access Schools	Total # of Qualifying Schools that Displaced Students Could Access	Total Estimated Capacity of Qualifying Schools that Displaced Students Could Access
5	25	4	39	9	497	13	536
10	25	11	53	21	1379	32	1432
15	25	30	95	30	2005	60	2100
20	25	47	168	34	2113	81	2281
25	25	62	241	42	2283	104	2524
30	25	95	508	49	2347	144	2855

#### Unreasonable Hardship Data Key Takeaways

- There are 4 accessible schools of choice that are qualifying and that are located nearby, within 5 miles. This was not in agreement with views expressed at the school by the leadership, parents, or teachers. This could accommodate a total of 39 students.
- It appears that this school has an even greater number of accessible local access schools, up to 9 within a 5-mile radius and 21 within a 10 mile radius. This could accommodate up to 1379 students.
- The total number of schools within a 10 mile radius that are accessible is 32 schools, and could accommodate up to 1432 students.
- Community members and parents expressed that it would be very difficult for walking students to be able to find transportation to a new school location.

**Unreasonable Hardship Review Part 4: Final Determination**

The SRO's Final Unreasonable Hardship Determination is based on a comprehensive review of all available data, the results from both operational and academic on-site review visits and an examination the other public school options that are available to the students that would be impacted by the closure of **Law Elementary School**. All of the information produced and insights gained from the Unreasonable Hardship Review Process that have been detailed in this report, were considered when answering the three key questions that comprise the SRO's Final Unreasonable Hardship Determination.

**Question 1:** Are the academic and operational and academic realities of the identified school reflective of a school poised for rapid turnaround?

	The academic and operational realities of the identified school reflective of a school poised for rapid turnaround.
	The academic but not the operational realities of the identified school reflective of a school poised for rapid turnaround
	The operational but not the academic realities of the identified school reflective of a school poised for rapid turnaround
	Neither the academic nor the operational realities of the identified school reflective of a school poised for rapid turnaround

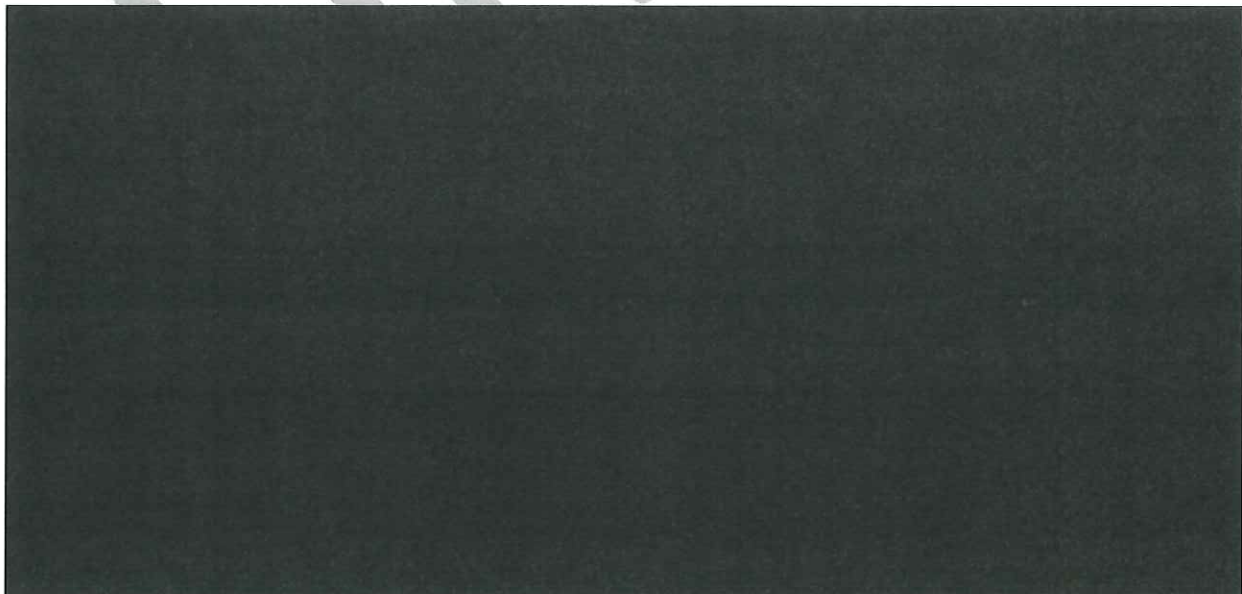
**Question 2:** Are there are sufficient other public school options reasonably available to these pupils?

	There are sufficient other public school options reasonably available to these pupils?
	There are insufficient other public school options reasonably available to these pupils?

**Question 3:** Would the proposed NLA action result in an unreasonable hardship to the displaced pupils?

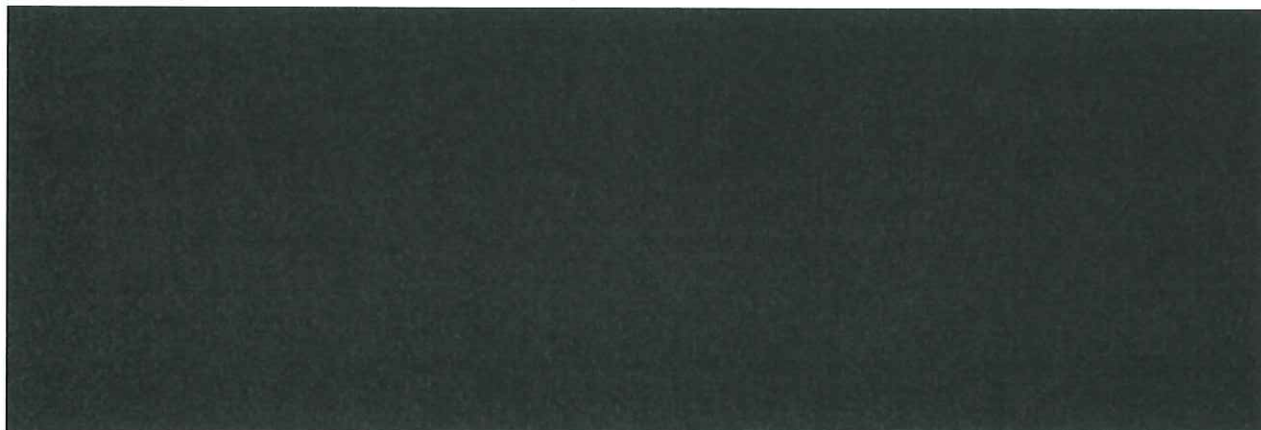
	The proposed NLA action would not result in an unreasonable hardship to the displaced pupils
	The proposed NLA action would result in an unreasonable hardship to the displaced pupils

**Determination:**





**Next Steps:**



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## **APPENDIX A: SRO Unreasonable Hardship Data Request Packet**

The SRO is committed to ensuring that the Unreasonable Hardship Determination required under MCL 380.391(3), MCL 380.507(6), MCL 380.528(6), MCL 380.561(6), or optionally adopted under MCL 380.1280c is as informed as possible. Therefore, the SRO is requested that the following information be provided in an editable format (e.g., .doc, .docx, .xls, .xlsx, etc.) by Tuesday, February 1, 2017. Where possible, the information provided will be verified against previously reported and publically available data.

### **Data review components:**

- Academic
- Climate and Culture
- Professional
- Operational

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**Academic Data****Top-to-Bottom Rankings by Year**

2012	2013	2014	2015	2016
9	5	1	0	0

**Student Proficiency – Mathematics**

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students	7.79		
Native American			
Asian			
African-American	7.01		
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	7.66		
Students with Disabilities (IEP & 504)	22.73	15.63	14.29
English Language Learners			

**Student Proficiency – Reading/ELA**

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students	25.23	6.37	5.92
Native American			
Asian			
African-American	24.44	6.07	5.96
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	25.29	6.13	5.78
Students with Disabilities (IEP & 504)	26.15	10.53	9.38
English Language Learners			



**Student Proficiency – Science**

<b>Student Group</b>	<b>% Proficient or Above 2013-2014</b>	<b>% Proficient or Above 2014-2015</b>	<b>% Proficient or Above 2015-2016</b>
All Students			
Native American			
Asian			
African-American			
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)		5.26	
English Language Learners			

**Student Proficiency – Social Studies**

<b>Student Group</b>	<b>% Proficient or Above 2013-2014</b>	<b>% Proficient or Above 2014-2015</b>	<b>% Proficient or Above 2015-2016</b>
All Students			
Native American			
Asian			
African-American			
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)			
English Language Learners			

## Climate and Culture Data

Enrollment by Subgroup<sup>2</sup>

Race	2013-2014	2014-2015	2015-2016
All Students	518	633	585
Male	275	346	302
Female	243	287	283
Native American			
Asian			
African-American	514	627	582
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	391	492	521
Students with Disabilities (IEP & 504)	87	73	64
English Language Learners			

## Enrollment by Grade

	K	1	2	3	4	5	6	7	8	9	10	11	12	Total
2013-2014	50	70	62	53	59	73	57	53	41	0	0	0	0	518
2014-2015	93	72	88	71	55	71	72	58	53	0	0	0	0	633
2015-2016	73	81	67	71	70	54	62	59	48	0	0	0	0	585

## Special Population Percentages

	2013-2014 (%)	2014-2015 (%)	2015-2016 (%)
English Language Learner			
Students with Disabilities (IEP & 504)	16.8%	11.5%	10.9%
Economically Disadvantaged	75.5%	77.7%	89.1%

## Attendance

	2013-2014	2014-2015	2015-2016
Attendance Rate (%)	90.8%	83.2%	84.3%
Percent Chronically Absent	17.9%	65.6%	73.4%
Chronically Absent Student Count	102	392	410

<sup>2</sup> Enrollment by student(s) does not necessarily indicate that the student(s) will take state assessments.

**Professional Data****Teacher Evaluations**

	<b># of Teachers 2013-2014</b>	<b>% of Teachers 2013-2014</b>	<b># of Teachers 2014-2015</b>	<b>% of Teachers 2014-2015</b>	<b># of Teachers 2015-2016</b>	<b>% of Teachers 2015-2016</b>
Highly Effective	0	0.0%	7	19.4%	0	0.0%
Effective	19	100.0%	28	77.8%	23	59.0%
Marginally Effective	0	0.0%	1	2.8%	14	35.9%
Ineffective	0	0.0%	0	0.0%	2	5.1%

<b>Total Teachers</b>	19	36	39
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